

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

Civil Action No. 1:21-cv-11181-DPW

INA STEINER, DAVID STEINER, and  
STEINER ASSOCIATES LLC,

Plaintiffs,

v.

EBAY, INC., PROGRESSIVE F.O.R.C.E.  
CONCEPTS, LLC, DAVID WENIG, STEVE  
WYMER, JAMES BAUGH, DAVID  
HARVILLE, BRIAN GILBERT, STEPHANIE  
POPP, STEPHANIE STOCKWELL, VERONICA  
ZEA, PHILIP COOKE, and JOHN AND JANE  
DOE

Defendants.

**DEFENDANT STEPHANIE POPP'S SECOND ASSENTED-TO  
MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT**

Defendant Stephanie Popp, by and through undersigned counsel, hereby moves for a 30-day extension of time, to and including November 29, 2021, to answer or otherwise respond to the Complaint in the above-captioned matter. As grounds therefore, undersigned states:

1. Ms. Popp's response is presently due on October 29, 2021.
2. Undersigned's minor son is ill with COVID-19 and undersigned, a single parent, is his sole caregiver during his isolation and recovery period. As a result, undersigned has lost, and will continue to lose, significant work time.
3. Undersigned has multiple upcoming deadlines (some of which cannot be extended), including but not limited to an opening brief in *Epstein et al. v. Falmouth Zoning Board of Appeals et al.*, 2021-P-0708 (Mass. App. Ct.) (due October 25, but awaiting

order on requested extension); a Reply to a Petition for Rehearing *En Banc* in *Judge Rotenberg Center et al. v. Food and Drug Administration et al.*, No. 20-1087 (D.C. Cir.), due on November 1 (an already-extended deadline on account of a colleague's COVID-related absence); and a Reply to Opposition to Motion for Partial Summary Judgment in *FBT et al. v. Feldman et al.*, No. 1784-cv-03547 (Sup. Ct.), due on November 5 (with hearing set for November 16).

4. Undersigned therefore requires additional time to respond to Plaintiffs' complaint in the instant matter.
5. The Plaintiffs, through counsel, have assented to this motion.

WHEREFORE, Defendant respectfully requests that this Court grant an extension of time to answer or otherwise respond to the Complaint in this matter to November 29, 2021.

Respectfully submitted,

STEPHANIE POPP,

By her attorney,



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Dated: October 26, 2021

**CERTIFICATION PURSUANT TO L.R. 7.1(A)(2)**

Undersigned counsel certifies that she has conferred with counsel for Plaintiffs and counsel for Plaintiffs assents to this Motion.

  
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Alexandra H. Deal